

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF MISSISSIPPI**

IN RE: Roy W. Freeman, Jr.

Ashley L. Freeman

CASE NUMBER: 23-51535-KMS

**RESPONSE TO MOTION TO DISMISS**

Comes now the Debtor(s), Roy W. Freeman, Jr. and Ashley L. Freeman, by and through Debtor(s) attorney, and files this Response to Motion to Dismiss, and in support thereof would show unto the Court the following:

1. That the Debtor(s) deny the allegations contained in the Motion that the case should be dismissed.

Debtor(s) request that the Motion to Dismiss be denied.

Respectfully submitted,

Roy W. Freeman, Jr.

Ashley L. Freeman

BY: /s/ Richard R. Grindstaff

Richard R. Grindstaff

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**CERTIFICATE OF SERVICE**

This is to certify that I, the undersigned attorney of record for the Debtor(s), have this date mailed, postage prepaid, by United States Mail, a true and correct copy of the above and foregoing Response to Motion to Dismiss to the following at their usual mailing addresses or by electronic filing:

Chapter 13 Trustee

United States Trustee

[USTPRegion05.JA.ECF@usdoj.gov](mailto:USTPRegion05.JA.ECF@usdoj.gov)

SO CERTIFIED this, June 12, 2025.

/s/ Richard R. Grindstaff  
Richard R. Grindstaff.